

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CRAIG DAVIS, as parent and natural  
guardian of ANDREW DAVIS,

Plaintiff,

-against-

CATAMOUNT DEVELOPMENT CORP.,  
CATAMOUNT DEVELOPMENT CORP.,  
d/b/a CATAMOUNT SKI AREA,

Defendants.

CIVIL ACTION

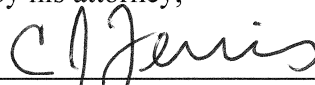
No. 05-30011-MAP

PLAINTIFF'S REPLY TO DEFENDANT'S  
LIMITED OPPOSITION TO PLAINTIFF'S MOTION TO  
COMPEL PRODUCTION OF ACCIDENT REPORTS

Defendant has proposed limiting Plaintiff's access to reports of ski accidents by deleting the identity of skiers injured in these accidents. This limitation would make it impossible to locate potential witnesses without filing another motion to compel, and delaying matters 20 - 30 days. This is contrary to the intended scope of discovery.

The reports do not contain communications with doctors, and are unlikely to contain personal or private medical information. They relate to accidents that took place in public, and were presumably witnessed by other members of the public. The privacy interests allegedly protected by the proposed redaction is a specious argument which will make it more difficult for Plaintiff to make use of these records.

Respectfully Submitted,  
Craig Davis, as parent of Andrew Davis, Plaintiff  
by his attorney,



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